

**Thank you for the opportunity to offer comments ... In the Matter of  
Amendment of Part 97 of the Commission's Rules To Implement WRC-03  
Regulations Applicable to Requirements for Operator Licenses in the  
Amateur Radio Service  
FCC 05-143  
WT Docket No. 05-235**

**You state** "We believe that this proposal, if adopted, would (1) encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators..."

**Nothing in this proposal has anything to do with someone, or anyone, making a contribution to the advancement of the radio art. Becoming an amateur radio operator is a legal step associated with an examination of the individual. Interest in communications technology and contributing to the radio art are not related. Most who contribute to our current communications technology are not amateur radio operators. Most who operate radios are not amateur radio operators. Most amateur radio operators never contribute to communications technology or to advancement of the radio art. Additionally, with the discontinuation of one learning theory and basic science, having been replaced instead with the memorization of a set of questions and associated answers, one cannot make any assumption that amateur radio operators will have any basis to advance the radio art or communications technology. FCC regulatory limitations prevent most, if not all, new modes, emissions, and advancements, of the science on the amateur service frequencies.**

**You state** "(2) eliminate a requirement that we believe is now unnecessary and that may discourage amateur service licensees from advancing their skills in the communications and technical phases of amateur radio"

**Telegraphy knowledge, or lack of knowledge, has nothing to do with advancing skills, technical phases, or discouragement of licensees. Basic elements of knowledge build an educational foundation.**

**You state** "(3) promote more efficient use of the radio spectrum currently allocated to the amateur radio service.

**Radio spectrum efficiency has nothing to do with telegraphy examination requirements, except that telegraphy is a much more efficient mode than most. It seems you have somehow come to the opposite conclusion based upon bandwidth and information exchange rates.**

**It is stated** "and on volunteer examiners (VEs) and VE coordinators (VECs), because these examinations require extensive preparation and special equipment to administer properly."

**Hogwash, as some would say. A simple tape recorder or any of dozens of analog and digital formats provide easily used methods to administer the examination elements.**

**It is stated** “requirement limits the number of people, especially those who are handicapped, who can take advantage of amateur radio as a hobby.”

**This is not my understanding from both a health care professional position and from a VE position. Accommodations have been a part of the examination process for many years.**

**You state** “We believe that this amount of upgrading activity confirms the conclusion reached in the *Restructure Report and Order* that the primary deterrent to upgrading the Amateur Extra Class was the formerly required twenty wpm telegraphy examination.”

**That is one assumption with which I would very strongly disagree. It should be viewed from another perspective. One could say that the removal of the “deterrent” was simply reducing the knowledge, skill, and mastery of the art examination to a level more individuals were willing to achieve with less effort. The Amateur Extra Class skill set and expertise, when associated with the twenty wpm telegraphy examination, should not be associated with the same skill set and expertise of one who answers fixed questions and answers, and a five wpm or no telegraphy examination. With such logic, one could say that a graduate from high school is the same with or without having taken any arithmetic or mathematics courses during the curriculum of their education. They would both be termed graduates, but their skill set and potential usefulness is certainly not the same.**

**You state** “because there is no objective means to measure technical and operating skills.”

**Nonsense. Testing for objective, subjective, technical, operational skills, and a huge array of other parameters are done on a daily basis in a wide variety of environments.**

**You state** “Also, the purpose of the written examinations, under our rules, is not to determine whether a person has achieved a particular level of skill, but rather to determine whether an individual can properly operate an amateur station.”

**With this statement, you appear to take the firm position that being able to turn on a particular type device, communicate into it, and communicate out of it, is all that is expected to be licensed. With such a position, why have any examination? One could assume the vast majority of individuals are able to do this. Cell phones, wireless telephones, WiFi, and similar devices are used without any licensing of the operator, not having a skill requirement for operation.**

**You state** “47. In summary, we believe that the public interest will be served by revising the amateur service rules to eliminate the telegraphy testing requirement. We also believe that these proposed rule changes will allow amateur service licensees to better fulfill the purpose of the amateur service and will enhance the usefulness of the amateur service to the public and licensees. We therefore seek comment on these proposed rule changes.”

**The continued movement toward the least common denominator is a poor excuse for regulation and the advancement of the amateur radio service. Telegraphy and amateur radio have been associated for many years. There are currently other regulated and unregulated services, which offer HF communications and opportunity for advancing skills and technology not associated with telegraphy.**

**I would not agree with your conclusion. If the changes you propose do not “better fulfill the purpose of the amateur service and ...enhance the usefulness of the amateur service to the public and licensees,” you will have forever further changed the fabric and foundation of amateur radio and facilitated its demise as a strategic national resource.**